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April 20, 2022

Via ECF

Magistrate Judge Sharon A. King
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Dunn v. PHH Mortgage Corporation*
Civ. Case No. 1:20-cv-05848-RBK-KMW

Dear Judge King:

The parties respectfully write to request clarification of the Court's Text Order dated March 28, 2022, which stayed all "pretrial factual discovery" while the parties explore settlement, which stay will remain in place "pending further Order of the Court." (ECF Doc. No. 54.) In addition to pretrial factual discovery, the Amended Scheduling Order in this matter sets forth deadlines related to expert disclosures and dispositive motions. (ECF Doc. No. 38 ¶¶ 4-5.) Other deadlines also may arise over the coming months by operation of the Court's Local Civil Rules. Accordingly, to ensure the most efficient use of the parties' and the Court's resources, the parties hereby jointly request that the Court clarify its March 28, 2022 Text Order to apply the stay to all pretrial deadlines in this matter, rather than pretrial factual discovery only.

Should the Court have questions about this request, please let us know.

Very truly yours,

**COHN LIFLAND PEARLMAN
HERRMANN & KNOFF LLP**

/s/Jeffrey W. Herrmann

Jeffrey W. Herrmann

Attorney(s) for Plaintiff(s)

STADLEY, RONON, STEVENS & YOUNG, LLP

/s/Joe N. Nguyen

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